

Liakas Law, P.C.
Nicholas Liakas (NL – 7899)
65 Broadway, 13TH Floor
New York, New York 10006
(212) 937-7765
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KHALILIA SOUTHERLAND,	:
	:
Plaintiff,	:
	:
- against -	:
	:
ARTHUR BERNARD JOHNSON, DOMINO'S	:
PIZZA LLC and RYDER TRUCK RENTAL, INC.,	:
	:
Defendants.	:
-----X	

Civil Action No.: 1:18-CV-1517

PLAINTIFFS' RULE
26(a)(2)(C) EXPERT DISCLOSURE
OF DR. MICHAEL FALON, MD

Plaintiff, KHALILIA SOUTHERLAND, by and through her attorneys, LIAKAS LAW, P.C., hereby submits the following as an expert witness disclosure pursuant to Rule 26(a)(2)(c) of the Federal Rules of Civil Procedure:

The plaintiff will call Dr. Michael Faloon, M.D. as her expert witness at trial. Dr. Faloon is Board Certified in Orthopaedic Surgery. His business address is 504 Valley Road, Suite 203, Wayne, New Jersey 07470.

A copy of the *curriculum vitae* ("CV") for Dr. Michael Faloon is attached hereto as **Exhibit "A."**

A comprehensive list of Dr. Michael Faloon's previous publications is enclosed herewith, as part of Dr. Faloon's CV, which is annexed as **Exhibit "A."** Upon information and belief, Dr. Faloon has provided testimony as an expert at trial, or by deposition, once during the last four (4) years on March 15, 2018 at a deposition in *Cheyenne Joseph Dones v. The United State of America*, United States District Court, Eastern District of New York on March 15, 2018.

Dr. Faloon's rate of compensation is \$7,500 for a half-day and \$10,000 for a full-day of testimony.

Dr. Faloon will be relying on his professional skill, experience and knowledge, discovery exchanged in this action, and relevant treatises and texts.

Plaintiffs expressly reserve the right to supplement this response upon completion of discovery to the extent permitted by the Court.

KHALILIA SOUTHERLAND

Dr. Faloon will testify as to the plaintiff's injuries to the cervical spine and lumbar spine all which have directly affected the bones, tendons, tissues, muscles ligaments, nerves, blood vessels and soft tissue in and about the involved areas. Dr. Faloon will also testify as to the associated and concomitant impairments and negative effects upon plaintiff's enjoyment of life, day-to-day existence, activities, functions, employment and involvements; Plaintiff's limitation, diminution and/or effect of functions, activities, vocation, avocation and all other activities in which the plaintiff engaged prior to the underlying accident, and plaintiff's inability to resume pre-accident functions, social relations, contacts and participation.

Further, Dr. Faloon will testify as to all associated pains, disabilities, discomforts, impairments, impediments, limitations of function and activities; restriction and limitation of motion and pain on motion and possible loss of use of the above-mentioned parts, including atrophy; and all having substantially prevented this plaintiff from enjoying the normal fruits of activities, social, educational and economical.

Dr. Faloon will testify based on the medical treatment that Plaintiff has been receiving from the time of the accident through the present including his personal examinations of the Plaintiff, as well as examinations by the Plaintiff's other treating physicians. Dr. Faloon will also

testify as to the necessity for the medical treatment which Plaintiff will require in the future, including but not limited to the need for future surgery of the cervical spine including but not limited to a laminectomy, discectomy and/or fusion; the need for future surgery of the lumbar spine including but not limited to a laminectomy, discectomy and/or fusion; the need for future orthopedic visits; future neurological visits; future pain management visits; future physical therapy visits; future pain medication; future diagnostic testing; and future rehabilitation services; and that Plaintiff will suffer from chronic pain and continue to have loss of mobility in the aforementioned areas. He will also testify as to the cost of these future services which are in excess of \$500,000.00.

Dr. Faloon's testimony will be based upon his own examinations of the plaintiff, diagnostic tests taken of the plaintiff, including but not limited to X-Ray films, CT Scans, EMG/NCV's and/or MRI films for which authorizations have previously been exchanged, the deposition of the plaintiff, opinions and medical records of Plaintiff's treating physicians, hospital records, reports and trial testimony.

Dr. Faloon will also testify about the anatomy of the cervical spine.

Dr. Faloon will testify that Plaintiff has an injury to the cervical spine, including, but not limited to, any bulging or herniated disc(s); fracture(s); nerve damage; nerve impingement; loss of range of motion. Specifically, Dr. Faloon will attest to the injuries observed during his clinical examinations of Plaintiff, the clinical examinations of Plaintiff's other treating physicians, and on all diagnostic testing, including but not limited to the MRIs of cervical spine as well as any/all EMG/NVC testing. He will testify as to the extent, if any, of radiculopathy, as well as the symptoms and conditions associated with such injuries/impairments.

He will testify regarding any treatments that Plaintiff underwent, including but not limited to any and all manipulation(s) under anesthesia, epidural steroid injections and/or any other treatments, injections, ablations, surgical and non-surgical manipulations, etc. to the plaintiff's cervical spine.

Dr. Faloon will testify that plaintiff will suffer from post-traumatic arthritis of the cervical spine; that plaintiff is a candidate for further surgical intervention, including, but not limited to, future cervical discectomy, laminectomy and/or fusion; that plaintiff still suffers from pain, swelling and has limited range of motion of the cervical spine; and that Plaintiff will suffer from chronic pain and continue to have permanent loss of mobility and use in the aforementioned areas.

Dr. Faloon will also testify about the anatomy of the lumbar spine.

Dr. Faloon will testify that Plaintiff had an injury to the lumbar spine, including, but not limited to, any bulging or herniated disc(s); fracture(s); nerve damage; nerve impingement; loss of range of motion. Specifically, Dr. Faloon will attest to the injuries observed during his clinical examinations of Plaintiff, the clinical examinations of Plaintiff's other treating physicians, and on diagnostic testing, including but not limited to the MRI of lumbar spine as well as any/all EMG/NVC testing. He will testify as to the extent, if any, of radiculopathy, as well as the symptoms and conditions associated with such injuries/impairments.

He will testify regarding any treatments that Plaintiff underwent, including but not limited to any and all manipulation(s) under anesthesia, epidural steroid injections and/or any other treatments, injections, ablations, surgical and non-surgical manipulations, etc. to the plaintiff's lumbar spine.

Dr. Faloon will testify that Plaintiff will suffer from post-traumatic arthritis of the lumbar spine; that Plaintiff is a candidate for further surgical intervention, including, but not limited to, future lumbar discectomy, laminectomy and/or fusion; that Plaintiff still suffers from pain, swelling and has limited range of motion of the lumbar spine; and that Plaintiff will suffer from chronic pain and continue to have permanent loss of mobility and use in the aforementioned areas.

Furthermore, Dr. Faloon will also testify regarding the extent to which, if any, the injuries sustained as a result of the subject accident exacerbated and/or aggravated any prior conditions, asymptomatic or otherwise, to any body part injured as a result of the accident in question.

Dr. Faloon will also testify regarding hypotheticals based upon Plaintiff's injuries to the cervical and lumbar spine.

Dr. Faloon will testify that all of the above injuries are permanent in nature and are causally connected to the Plaintiff's accident of June 19, 2017.

Dr. Faloon will give testimony and opinion regarding the Plaintiff's past, present and future prognosis, within a reasonable degree of medical certainty.

Dr. Faloon will give testimony as to all facts, opinions, examinations, records and/or reports as referenced in the medical reports of Plaintiff's treating physicians.

Plaintiff reserves the right to supplement the instant disclosure based upon any records and/or other information that may become available, as permitted by the FRCP and this Court's rules.

Dated: New York, New York
January 7, 2019

LIAKAS LAW, P.C.

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KENDRIC LAW GROUP P.C.
Attorneys for Defendants
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Garden City, New York 11530
(516) 732-4774

EXHIBIT A

Curriculum Vitae

Michael J. Falcón
University Spine Center
504 Valley Road Suite 203
Wayne, NJ 07470
(973)686-0700

Education:

John Cobb Scoliosis Fellowship
Hospital for Special Surgery/Weill Cornell Medical College.
New York, NY 2011-2012 Director : Oheneba Boachie-Adjei, MD

Orthopaedic Surgical Residency –

Seton Hall University School of Health and Medical Science Program
South Orange, New Jersey. 2006-2011

St. Joseph's Regional Medical Center & Children's Hospital
Paterson, NJ

Alfred I. du Pont Hospital for Children
Wilmington, DE

M.D. Rutgers University- New Jersey Medical School (Formerly University of
Medicine & Dentistry of New Jersey) Newark, New Jersey. 2006

M.S. Rutgers University - Graduate School of Biomedical Sciences
University of Medicine & Dentistry of New Jersey –
Newark, New Jersey. 2002

B.A. University of Notre Dame. Notre Dame, Indiana
Major: Ancient Greek & Pre-professional Studies. 2000

Academic Appointments:

Assistant Clinical Professor of Orthopaedic Surgery –Seton Hall University 2013-
present

Senior Clinical Associate in Orthopaedic Surgery - Weill Cornell Medical
College/Hospital for Special Surgery- 2011 -12

Clinical Instructor of Orthopaedic Surgery – Seton Hall University 2010-2011

Chief Resident of Orthopaedic Surgery St. Joseph's Regional Medical Center –
2010-2011

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Medical Licensure:

National Provider Identifier (NPI) 1043420136

New York State #260541 NY DEAN FF2492523

NY Workmen's Compensation #260541-SW Feb -24-2014

New Jersey State 25MA00915300 NJ DEAN FF3444192 CDS D10079900

Board Certification:

American Board of Orthopaedic Surgeons (ABOS) -2014-2024

Hospital Affiliations:

St Joseph's Regional Medical Center - Paterson, NJ 2012

St. Joseph's Children's Hospital - Paterson, NJ 2012

St Joseph's Wayne Hospital - Wayne, NJ 2012

Holy Name Medical Center, Teaneck, NJ 2013

St. Barnabas Medical Center, Livingston, NJ 2013

Professional Associations:

Diplomat National Board of Medical Examiners (NBME) - 2008

American Medical Association (AMA)

American Academy of Orthopaedic Surgeons (AAOS) - 2006 Candidate Fellow

North American Spine Society (NASS) - 2008

Scoliosis Research Society (SRS) - Candidate Fellow 2013

Notre Dame Orthopaedic Society - 2014

Awards & Features:

2015 New Jersey Family Magazine Favorite Kid's Docs - Orthopaedic Spine

2014 New Jersey Family Magazine Favorite Kid's Docs - Orthopaedic Spine

2014 New York Channel 7 Eyewitness News "Sisters Undergo Side-By-Side Surgery to Correct Spines in New Jersey"

2014 Star Ledger "2 Surgeries, 1 Hope: Sisters Side-By-Side for Identical Scoliosis Operations"

2014 Bergen Record "Young Sisters to Undergo 'Back-to-Back' Spinal Surgeries"

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2013 Louis A. Goldstein Award Nominee Scoliosis Research Society

2013 North American Spine Society Value Abstract Award Nominee

2012 Andrew M. Swanson Fund Scholarship – Hospital for Special Surgery

2012 Eastern Orthopaedic Association Travel Scholarship

Appointments:

Scoliosis Research Society Global Outreach Committee Appointment 2014-2017

Scoliosis Research Society CME Committee Appointment 2015-2016

Consultant – K2M, Inc Global Spinal Deformity Division 2014

Consultant/Faculty Instructor – DePuy Synthes Spine Future Leaders Workshop:
Surgical Management of Adult Deformity – April 2014

Publications:

“Unplanned Reoperations Affect Long Term Outcomes in Adult Spinal Deformity Patients Undergoing Long Fusions to the Sacrum” Michael J. Faleon MD, MS; David Essig MD, Woojin Cho MD, PhD, Gbolabo Sokunbi MD, Thomas Ross RN, Matthew B. Cunningham MD, PhD, Bernard A. Rawlins MD, Oheneba Boachi-Adjei MD –Spine Deformity July 2015

“Early Outcomes and Complications of Posterior Vertebral Column Resection” Elias Papadopoulos, MD Oheneba Boachie-Adjei... MD Michael Faleon MD, MS et al The Spine Journal- May 2015

“The Role of Magnetic Resonance Imaging in Acute Cervical Spine Fractures” Sina Pourtaheri, MD; Arash Emami, MD; Kumar Sinha; Michael Faleon, MD; Ki S. Hwang, MD Eiman Shafa, MD; Laurens Holmes, PhD, DrPH; –The Spine Journal – Nov 2014

“Ultra-low Dose Recombinant Human Bone Morphogenetic Protein-2 for 3-Level Anterior Cervical Discectomies and Fusions”- Sina Pourtaheri, MD; Arash Emami, MD; Eiman Shafa, MD; Kumar Sinha; Michael Faleon, MD, Kimona Issa MD Orthopedics April 2015.

“Paraspinal Muscle Atrophy After Lumbar Spine Surgery: What is the Evidence?” Sina Pourtaheri MD, Kimona Issa MD, Arash Emami MD, Ki Hwang MD, Michael Faleon MD, & Kumar Sinha MD – accepted for publication Orthopedics. 2015.

Risk Factors Associated with Adjacent and Remote Level Pathologic Vertebral Compression Fracture Following Balloon Kyphoplasty: 2 Year Follow-Up Comparison vs. Conservative Treatment” - Michael J. Faleon MD, MS, Mark Ruoff MD, Chetan Deshpande MD, Donald Hohman MD, Conor Dunn BA, Nicholas Beckloff, PhD & Dipak V. Patel, MD Manuscript accepted for publication J Long Term Effects of Med Implants 2015

Additional Risk Factors for Adding-on After Selective Thoracic Fusion in Adolescent Idiopathic Scoliosis: Implication of LIV Angle and Lumbo-Sacral Takeoff (LSTO) Woojin Cho, MD, PhD; Michael J. Faloon MD; David Essig, MD; Gbolabo Sokunbi, MD, Matthew Cunningham, MD, PhD; Oheneba Boachie-Adjei, MD- Manuscript Submitted to The Spine Journal

"The Importance of Sagittal Stable Vertebrae in Adolescent Idiopathic Scoliosis (AIS) Surgery" Woojin Cho, MD, PhD; David Essig, MD; Michael J. Faloon MD; Gbolabo Sokunbi, MD, Matthew Cunningham, MD, PhD; Oheneba Boachie-Adjei, MD- Manuscript Submitted to Spine Deformity

"Minimally Invasive Transforaminal Interbody Fusion in the Outpatient Setting: Selection Criteria and Perioperative Outcomes" Arash Emami, MD; Michael Faloon, M.D. M.S.; Kumar G Sinha, MD; Kimona Issa, MD, Sina Pourtaheri, MD; Eiman Shaffa, MD; Ashwani Gore; Sujal Patel, MD; Ki S Hwang, MD manuscript submitted to Orthopedics.

Complex Spine Cases: A Collection of Current Techniques "Late Treatment of Severe Progressive Early Onset Kyphoscoliosis with Halo Gravity Traction and Posterior Vertebral Column Resection" - Michael J. Faloon MD MSc, Michael Mendelow MD Oheneba Boachie-Adjei MD. Jaypee Brothers Medical Publishers Ltd. Editors M. Gupta, A. Vaccarro. Jan 31, 2015

Faloon M, Cunningham MB. Adolescent Idiopathic Scoliosis. In: Toy EC, Rosenbaum AJ, Roberts TT, Dines JS (eds): Case Files: Orthopaedic Surgery. New York, NY, McGraw-Hill; 2013: 259-65

Scientific Presentations:

"Pseudoarthrosis Rate in Minimally Invasive Transforaminal Lumbar Interbody Fusion(m-TLIF): 2-yr Outcomes vs Open TLIF" D. Thibaudau, Michael J. Faloon, K. Issa, S Pourtaheri, K. Sinha, K Hwang, A Emami- International Meeting of Advanced Spinal Techniques Kuala Lumpur Malaysia July 2015

The Incident Trends, Epidemiology, Mortality, & Economic Evaluation of Vertebral Osteomyelitis in the United States: A Nationwide Inpatient Database Study of 283,022 Cases from 1998 to 2010 K. Issa, M. Boylan, Michael J. Faloon, Q Naziri, K. Hwang, K Sinha, A Emami - International Meeting of Advanced Spinal Techniques Kuala Lumpur Malaysia July 2015

"Pre-operative Radiographic Risk Factors for Pseudoarthrosis in Minimally Invasive Transforaminal Lumbar Interbody Fusions" - S. Pourtaheri, A. Emami, E. Shaffa, K. Sinha, Michael J. Faloon, K. Hwang - Society of Minimally Invasive Spine Surgeon's Global Forum - Miami FL 2014

"Can Minimally Invasive Transforaminal Lumbar Interbody Fusions Be Safely Performed as an Outpatient Procedure?" Arash Emami, MD; Sina Pourtaheri, MD; Eiman Shaffa, MD; Sujal Patel MD; Kumar Sinha MD; Kimona Issa MD; Michael Faloon MD; Ki S. Hwang MD - NASS Annual Meeting San Francisco 2014

"Risk factors for floating segment degeneration in adults after long segment fusion unto the lumbar spine" Cho W, Pawar A, Lee A, Michael Faleon MD, Cunningham M, Rawlins B, Boachie-Adjei O; International Society for the Study of the Lumbar Spine Annual Meeting Seoul, South Korea 2014

"Selection Criteria and Early Peri-Operative Outcomes of Minimally Invasive Transforaminal Lumbar Interbody Fusion in the Outpatients Setting" Elwan Shafa MD Michael Faleon MD MS, Ki Hwang MD, Kumar Sinha MD, Arash Emami MD Annual Meeting of Eastern Orthopedic Association Miami FL 2013

"Does Return to OR Affect Long Term Outcomes in Adult Spinal Deformity Patients Undergoing Long Fusions to the Sacrum? Minimum 5 yr Follow-up" Michael J. Faleon MD; David Essig, MD; Gbolabo Sokunbi, MD, Matthew Cunningham, MD, PhD; Oheneba Boachie-Adjei, MD Scoliosis Research Society Annual Meeting Podium Chicago, IL 2012

Adolescent Idiopathic Scoliosis (AIS): Implication of LIV Angle and Lumbo-Sacral Takeoff (LSTO)" Woojin Cho, MD, PhD; Michael J. Faleon MD; David Essig, MD; Gbolabo Sokunbi, MD, Matthew Cunningham, MD, PhD; Oheneba Boachie-Adjei, MD Scoliosis Research Society Annual Meeting Podium Chicago, IL 2012

"The Importance of Sagittal Stable Vertebrae in Adolescent Idiopathic Scoliosis (AIS) Surgery" Woojin Cho, MD, PhD; David Essig, MD; Michael J. Faleon MD; Gbolabo Sokunbi, MD, Matthew Cunningham, MD, PhD; Oheneba Boachie-Adjei, MD International Meeting of Advanced Spinal Techniques Podium Istanbul, Turkey 2012 SRS Annual Meeting Lyon, France 2013

"Long Term Outcomes of Long Fusions to the Sacrum for Adult Scoliosis: A Comparison of Unilateral, Bilateral Iliac, or Sacral Screws Alons" - Michael J. Faleon MD; David Essig, MD; Gbolabo Sokunbi, MD, Matthew Cunningham, MD, PhD; Oheneba Boachie-Adjei, MD Poster Scoliosis Research Society Annual Meeting Poster Chicago, IL 2012 International Meeting of Advanced Spinal Techniques Poster Istanbul, Turkey 2012

"Posterior Vertebral Column Resection for Kyphosis Correction in Juveniles from West Africa: Intra-operative, Early & 2-year Outcomes and Complications" Michael J. Faleon MD; Meredith, Dennis S.; Cho, Woojin; King, Akilah B.; Lonner, Baron S.; Pallase, Ferran; Mandelkow, Michael J.; Papadopoulos, Elias C.; Hess, W. F.; Paonessa, Kenneth J.; Sánchez Pérez-Gruoso, Francisco Javier; Boachie-Adjei, Oheneba SRS Annual Meeting Poster Chicago, IL 2012 International Meeting of Advanced Spinal Techniques Poster Istanbul, Turkey 2012

"Long Term (10 year) MRI Follow-up of Paraspinal Muscle Quality After Posterior Fusion for Adolescent Idiopathic Scoliosis" Michael J. Faleon MD, Daniel Green MD MS, Anthony Chang MD, Lauren LaMont MD, Roger Widmann MD, Bernard Rawlins MD, Oheneba Boachie-Adjei MD International Meeting of Advanced Spinal Techniques Poster Istanbul, Turkey 2012

"Comparison of Long Term (5 YR) Reoperation Rates and Outcomes for Long Fusions to the Sacrum for Adult Deformity: Primary vs. Revision Surgery" Michael J. Falson MD, David Essig, MD; Gbolabo Sokunbi, MD, Matthew Cunningham, MD, PhD; Oheneba Boachie-Adjei, MD – Scoliosis Research Society Annual Meeting Lyon France 2013, Annual Meeting of Eastern Orthopedic Association Podium Lake George, NY American Academy of Orthopedic Surgeons Annual Meeting 2013 Chicago IL. Eastern Orthopedic Association 2013 Award Winner NASS Value Abstract Award Nominee 2013 Louis A. Goldstein Award Nominee SES 2013

"Peri-operative Complications of AxialIF in Long Fusions to the Sacropelvis in Adult Spinal Deformity" Gbolabo Sokunbi MD, Michael J. Falson MD; David Essig, MD; Gbolabo Sokunbi, MD, Matthew Cunningham, MD, PhD; Oheneba Boachie-Adjei, MD International Meeting of Advanced Spinal Techniques Poster Istanbul, Turkey 2012

"The Role of Magnetic Resonance Imaging in Acute Cervical Spine Fractures in the Elderly" Sina Pourtaheri, MD; Arash Emami, MD; Elnaz Shafa, MD; Kumar Sinha; Michael Falson, MD; Laurens Holmes, PhD, DPH; Ki S. Hwang, MD - International Meeting of Advanced Spinal Techniques Poster Istanbul, Turkey 2012

"Increased Risk of Subsequent Fracture with Non-operative Treatment of Osteoporotic Vertebral Compression Fracture" Michael J. Falson MD, Mark Ruoff MD, Chetan Deshpande MD, Donald Holman MD, Conor Dunn, & Dipak V. Patel North American Spine Society Annual Meeting Podium Chicago IL Nov 2011

"Does MRI Change Pre-operative Planning in the Treatment of Acute Cervical Trauma?" Michael J. Falson MD, Ki Soo Hwang MD, Nema Pourtaheri MD, Kumar Sinha MD, Conor Dunn, Dipak V. Patel MD, & Arash Emami MD. North American Spine Society Annual Meeting Podium Chicago IL Nov 2011 Cervical Spine Research Society Annual Meeting 2012

"Better Outcomes in Adolescent Idiopathic Scoliosis with All Pedicle Screw Constructs" Michael J. Falson MD, S Shah, R Betz, P Newton, B Lonner, H Shuffelberger, and the Harms Study Group. Podium Presentation New Jersey Orthopedic Society November 2010 Pediatric Orthopedic Society of North America Annual Meeting Poster Montreal, QC May 2011

"Risk Factors Associated with Adjacent and Remote Level Pathologic Compression Fracture Following Balloon Kyphoplasty" C. Deshpande, M. Ruoff, D. Holman, Michael J. Falson MD International Meeting of Advanced Spinal Techniques Poster Toronto, ON. 2010

"Anterior Interbody Distraction and Positional Reduction for Intermediate to High Grade Spondylolisthesis: A Clinical & Radiographic Review of a Novel Technique in 24 Cases" A. Emami Michael J. Falson MD, N. Pourtaheri, K. Hwang K Sinha. International Meeting of Advanced Spinal Techniques Poster Toronto, ON. 2010

Michael Falsom 7

"Safety and Accuracy of Percutaneously Placed Pedicle Screws Using Intraoperative Dual Planar Fluoroscopy" Michael J. Falsom MD, A. Emami, K. Hwang, K. Sinha, F. Mahmood & E. Milman. International Meeting of Advanced Spinal Techniques Poster Hong Kong 2008

"Trans-Sacral Interbody In situ Fusion for High Grade Spondylolisthesis" F. Mahmood, A. Emami, Michael J. Falsom MD, K. Sinha. International Meeting of Advanced Spinal Techniques Poster Hong Kong 2008

"C- Reactive Protein Levels Decrease Post-operatively in Both Laparoscopic Gastric Bypass and Laparoscopic Gastric Band Patients" Michael J. Falsom MD, S. Beilsley, D. Farkas, & G.H. Ballantyne. Annual meeting for the Society of American Gastrointestinal and Endoscopic surgeons. Podium Dallas, TX. 2006

Academic Presentations :

"Scoliosis Update – What's New & Growing?" Department of Pediatrics Grand Rounds St. Barnabas Medical Center, Livingston NJ March 2015

"Soluciones para Corregir las Patologias de la Columna En 3-D con K2M Mesa" Promedon Spine, Lima Peru January 18 2015

"Routine Internal Distraction for Adolescent Idiopathic Scoliosis Correction: Can We Save Levels and Still Maintain Balance?" 96th Annual Hospital for Special Surgery Alumnae Meeting New York NY Nov 1 2014

"Innovations in Scoliosis Management" Department of Pediatrics Grand Rounds The Children's Hospital of New Jersey – Beth Israel Medical Center, Newark New Jersey. December 4, 2013

"What's Around the Bend? Current Management of Idiopathic Scoliosis?" St. Joseph's Children's Hospital Department of Pediatrics' Grand Rounds December 3, 2013

"Growth Modulation vs. Distraction Techniques in Early Onset Scoliosis" Faculty David B. Levine MD Spinal Deformity Symposium. Hospital For Special Surgery June 1, 2012

"Posterior Vertebral Column Resection in Juveniles from West Africa" 22nd Annual Leon M. Kruger, MD Guest Lectureship. Springfield Shriner's Hospital for Children May 2012

"How is Spinal Surgery like Psychiatry?" – Physicians Assistant's Lecture Series Hospital for Special Surgery May 2012

"Better Outcomes in Adolescent Idiopathic Scoliosis with All Pedicle Screw Constructs" - St. Joseph's Regional Medical Center Paterson NJ Department of Orthopaedic Surgery Grand Rounds April 2011

"Case Presentation - Lost Biopsy Results" New Jersey Orthopaedic Society Fall Conference 2009

Michael Faloon 2

"Case Presentation - Antibiotic Spacer Dislocation" New Jersey Orthopaedic Society Fall Conference 2008

"Classical Aesthetic Philosophy in Hellenistic Sculpture - Aristotelean Aesthetics in Lysippan Sculpture"- Harvard Medical School Plastic Surgery Grand Rounds October 2005

Work Experience:

Gross Anatomy Laboratory Instructor- Weill/Cornell Medical College
New York, New York - 2012

Class Lecturer - Seton Hall University School of Health and Medical Sciences
Physicians Assistant - Introduction to Orthopedics I & II
Physical Therapists and Athletic Trainer's "Orthopedic Imaging"
Seton Hall University - South Orange, NJ. 2010.

Clinical Assistant to Vice President of Research & Development
Eisai, Inc/ Eisai Medical Research. Teaneck, NJ
2001- 2003

Assistant Freshman/ Varsity Wrestling Coach
Seton Hall Preparatory School. West Orange, NJ
2001 - 2002

Extracurricular & Community Activities:

Foundation of Orthopedics and Complex Spine (FOCOS)-
Surgeca Volunteer - Accra, Ghana Nov 2011, April 2012

Butterfly Foundation - Fundacion Mariposa Dominican Republic
Scoliosis Spine Clinic - Santo Domingo, Dominican Republic. Oct 2010.

Assistant Athletic Team Physician - Seton Hall University Men's Baseball,
Soccer, & Volleyball, and Women's Soccer, Volleyball, & Softball. South
Orange, NJ 2006-2011.

High School Football Team Physician - Butler, Clifton, DePaul Preparatory,
Kinnelon, Pompton Lakes & West Milford High Schools in New Jersey. 2006 -
2011

Metropolitan Museum of Art - New York, NY

University of Notre Dame Sorin Society - 2013- present

Seton Hall Preparatory School -- Dean's Club 2014

CERTIFICATION OF SERVICE

I, Nicholas Liakas, Esq., an attorney with the firm of Liakas Law, P.C. and admitted to practice in the United States District Court for the Eastern District of New York, do hereby certify and affirm that on January 7, 2019, I caused Plaintiffs' Expert Witness Disclosure to be served by electronic mail upon the following counsel:

CHRISTOPHER KENDRIC (1870)
KENDRIC LAW GROUP P.C.
Attorneys for Defendants
1225 Franklin Avenue, Suite 450
Garden City, New York 11530
(516) 732-4774

By: /s/ Nicholas Liakas
Nicholas Liakas